

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in The U.S.
4 DISTRICT COURT at Seattle, Washington.

5 APRIL 29 2010

6 BRUCE BIFKIN, Clerk

7 By [Signature] Deputy

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT TACOMA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSHUA ROBERT STARNES,

15 Defendant.

CASE NO. **CR 10 5294 RBL**
INDICTMENT

16 The Grand Jury charges that:

17 **COUNT 1**

18 **(Transportation of Child Pornography)**

19 On or about December 2, 2009, at Olympia, within the Western District of Washington,
20 and elsewhere, JOSHUA ROBERT STARNES, did knowingly transport child pornography, as
21 defined in Title 18, United States Code, Section 2256(8)(A), using any means or facility of
22 interstate and foreign commerce, and in and affecting interstate commerce, by any means,
23 including by computer.

24 All in violation of Title 18, United States Code, Sections 2252A(a)(1).

25 **COUNT 2**

26 **(Possession of Material Constituting or Containing Child Pornography)**

27 On or about December 31, 2009, at Olympia, within the Western District of Washington,
28 JOSHUA ROBERT STARNES, did knowingly possess matter that contained child pornography,
as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped,

1 and transported in interstate and foreign commerce by any means, including by computer, and
2 that was produced by using materials that had been mailed, shipped and transported in interstate
3 and foreign commerce by any means, including by computer.

4 All in violation of Title 18, United State Code, Section 2252A(a)(5)(B).

5 **FORFEITURE ALLEGATIONS**

6 Upon conviction for the above offenses, Defendant JOSHUA ROBERT STARNES shall
7 immediately forfeit to the United States, pursuant to Title 18, United States Code, Section
8 2253(a), all of his rights, titles and interests in any and all property, real or personal, that was
9 used, or was intended to be used, to commit or to promote the commission of the charged
10 offenses, and any visual depictions, as described in Title 18, United States Code, Section 2252,

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1 that were produced, transported, mailed, shipped or received or possessed in violation of Chapter
2 110, United States Code, including, but not limited to, the following assets:

- 3 a. One custom desktop computer, including a 320GB Seagate hard drive bearing
4 serial number #9525AWVE; and
5 b. Any and all visual depictions of minors engaged in sexually explicit conduct, in
6 whatever form and however stored, including but not limited to, those stored on USB thumb
7 drives, memory cards, CDs/DVDs, and/or other disks.


8
9 A TRUE BILL


10 DATED: _____

11 *Signature of foreperson redacted pursuant to*
12 *the policy of the Judicial Conference of the*
13 *United States*

14 _____
FOREPERSON

15 
16 JENNY A. DURKAN
17 United States Attorney

18 
19 TESSA M. GORMAN
20 Assistant United States Attorney

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22 BRIAN D. WERNER
23 Assistant United States Attorney
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